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June 3, 2025

**BY ECF**

Honorable Margaret M. Garnett  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Stein v. City of New York, 24-cv-6877 (MMG)

Your Honor:

I represent Plaintiff, Alexander Stein (“Plaintiff”), in the above-mentioned matter. I write on behalf of the parties to respectfully and jointly request that the Court adjourn the Initial Pretrial Conference currently scheduled for June 12, 2025, and grant a similar extension of the deadline to submit the parties’ pretrial submissions. *See* Dkt. 17.

By way of background, Plaintiff alleges that, on September 10, 2024, he was subjected to violations of his first amendment rights and excessive force when he was removed from a New York City Council meeting while he was speaking. *See* Dkt. 1. Plaintiff further alleges that he has suffered injuries as a result of the force used. *Id.* On May 13, 2025, previous counsel for plaintiff filed his motion to withdraw as counsel and the undersigned filed his notice of appearance. Dkts. 18, 19. The Court granted predecessor counsel’s motion to withdraw today. Dkt. 20.

This adjournment is requested because the undersigned is currently scheduled to begin a 7–10-day trial in the matter of *Eckhart v. Fox News Network, LLC*, 20-cv-5593, in front of the Honorable Ronnie Abrams on June 16, 2025. As such, the undersigned must devote this time to preparations for trial, including preparing the cross-examination of Plaintiff’s expert and direct examination of Defendant’s rebuttal expert. In addition, among other matters, the undersigned also has an SEC investigation of a client pending and an arbitration before the American Arbitration Association for which an initial conference is scheduled on June 9, 2025, both of which will make it difficult for counsel to prepare adequately for the preliminary conference in this matter on the current timetable.

Counsel for the City of New York also has timing constraints. She is currently scheduled to appear at a conference in the matter of *Cheikhaoui v. City et al.*, 22 Civ. 8855 (CM) at 10 a.m., June 12, 2025 in front of the Honorable Colleen McMahon and she will be unable to be on time for both conferences without this adjournment.

The parties have conferred regarding availability and are both available on the following dates: July 16, 17, 22, 23, 24. The parties can confer further should the Court require additional available dates.

Accordingly, the parties respectfully and jointly request that the Court adjourn the Initial Pretrial Conference currently scheduled for June 12, 2025, and grant a similar extension of the deadline to submit their pretrial submissions.

I thank the Court for its courtesies in this matter.

Respectfully submitted,

*Eden P. Quainton*

Eden P. Quainton  
*Counsel for Plaintiff Alex Stein*

cc: **By ECF**  
*All counsel of record*

GRANTED. The Initial Pretrial Conference previously scheduled for June 12, 2025 is hereby ADJOURNED until **July 16, 2025 at 1:00 P.M.** The deadline for the parties' joint pre-conference submissions is likewise EXTENDED until **July 9, 2025.**

SO ORDERED. Dated June 4, 2025.

  
HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE